

COMMONWEALTH OF MASSACHUSETTS
Department of Telecommunications and Energy

**RESPONSE OF THE ATTORNEY GENERAL TO THE
SECOND SET OF INFORMATION REQUESTS FROM THE
BAY STATE GAS COMPANY
DTE 05-27**

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-34 Please refer to the Cavallo Testimony at p. 14, line 10. Mr. Carvallo suggests that the number of leaks from 2000 to 2004 exhibits a progressively downward trend. Is Bay State's analysis of twenty years worth of leak data versus Mr. Cavallo's five years worth of leak data more indicative of leak trends? If not, explain in detail why not. Provide all supporting analyses.

Response: The 2000 to 2004 data provides information on short term trending, and the twenty year figure of leak rates addresses long term trending, but it is important to take into consideration the distribution system dynamics underlying both these figures. See Transcript, Volume 17, pp. 2746-2752 for analysis and additional explanation.

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